

# Exhibit Z

1  
2 UNITED STATES DISTRICT COURT  
3 NORTHERN DISTRICT OF CALIFORNIA  
4 SAN FRANCISCO DIVISION  
Case No. 3:13-cv-04115-WHO

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5 IN RE KOREAN RAMEN ANTITRUST  
6 LITIGATION  
7

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8 THIS DOCUMENT RELATES TO  
9 ALL ACTIONS  
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March 29, 2016

9:03 a.m.

10  
11  
12 \*\*\*\*\* HIGHLY CONFIDENTIAL \*\*\*\*\*  
13 \*\*\*\*\* ATTORNEYS' EYES ONLY \*\*\*\*\*  
14

15  
16 Continued videotaped  
17 deposition of JOONG RAK LEE, taken by  
18 Plaintiffs, pursuant to Notice, held at  
19 the offices of Vertex, S Tower, 82  
20 Saermoonanro, Seoul, Korea, before Sharon  
21 Lengel, a Registered Professional  
22 Reporter, Certified Realtime Reporter, and  
23 Notary Public.  
24  
25

1 LEE - HIGHLY CONFIDENTIAL - ATTYS' EYES ONLY  
2 here, "management committee conference,"  
3 "management committee meeting," our  
4 company does not use that word in this  
5 context.

6 Q. In this context, what -- in this  
7 context, what would have been the proper  
8 word?

9 MS. KIM: Objection. Lacks  
10 foundation. Vague and ambiguous. And  
11 incomplete hypothetical.

12 A. I'm unable to think of any  
13 appropriate expression.

14 Q. Now, you stated that you were  
15 pressured to sign by the KFTC  
16 investigators.

17 Could you describe the pressure.

18 MS. KIM: Objection. Asked and  
19 answered.

20 A. So -- so after they questioned  
21 me, one of the two stepped out, came back,  
22 and said, "Look. It's getting dark.  
23 Please sign." And so as it were, I had  
24 already spent quite a lot of time there.  
25 The room was just an enclosed small room.

1     LEE - HIGHLY CONFIDENTIAL - ATTYS' EYES ONLY  
2     No bathroom break. No water. And I was  
3     being interrogated by these two  
4     individuals in a tag-team fashion. I just  
5     wanted to basically just get out of there.  
6     What is most important here is the fact  
7     that I did not write this. They typed it  
8     up.

9           Q.     Did you sign it?

10          A.     I did.

11          Q.     Did you read it before you  
12     signed it?

13                 MS. KIM: Objection. Calls for  
14     speculation. Lacks foundation. Asked  
15     and answered. And argumentative.

16          A.     No. I was not able to read  
17     through everything. Basically, under the  
18     circumstances, given the atmosphere there,  
19     it wasn't like one could just take his  
20     time reading through each passage.

21          Q.     Do you know what day of the week  
22     that you were at KFTC headquarters  
23     providing the answers to these questions?

24                 MS. KIM: Objection. Calls for  
25     speculation.